

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

PARAGON COMPONENT)	
SYSTEMS, LLC,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:24-cv-00246-CEA-CHS
)	
QUALTIM, INC., CENTER FOR)	
BUILDING INNOVATION, LLC,)	
DRJ ENGINEERING, LLC,)	
INSPIRED PURSUITS, LLC,)	
KIRK GRUNDAHL, and)	
SUZANNE GRUNDAHL,)	
)	
Defendants.)	

**PLAINTIFF PARAGON COMPONENT SYSTEMS, LLC’S FIRST SET OF REQUESTS
FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS**

Under Federal Rules of Civil Procedure 26 and 34, Plaintiff Paragon Component Systems, LLC provides its First Requests for Production to Defendants.

Instructions

Defendants must respond to these requests in compliance with the Federal Rules of Civil Procedure, applicable local rules of court and scheduling orders, and all other applicable rules and laws. Defendants must provide responsive documents and a log of any documents withheld based on a privilege within 30 days of service. These requests are continuing in nature. Defendants are required to supplement their responses pursuant to Federal Rule of Civil Procedure Rule 26(e)(1).

Definitions

“Defendants” or “You” means, collectively, Kirk Grundahl and Suzanne Grundahl individually and each of Qualtim, Inc., Center for Building Innovation, LLC, DrJ Engineering, LLC, and Inspired Pursuits, LLC and all parents, subsidiaries, affiliates, and related companies to

any of the foregoing and all owners, employees, members, directors, officers, agents, contractors, consultants, and representatives of any of the foregoing, and any other entities that may be later named as defendants in the present litigation. Each of the Defendants individually may be referenced herein as a Defendant.

“Paragon” or “Plaintiff” means Paragon Component Systems, LLC.

“Paragon Truss Software” means all software, including all computer programs, computer applications, source code, object code, application programming interfaces, software architecture, functionality, design, and user interfaces, and all software versions of each of the foregoing, and all user and developer documentation describing any of the foregoing, that are (1) used in or made available to customers through www.paragontruss.com or www.trusspal.com or (2) authored in part or in whole by Paragon or its employees, agents, consultants, contractors, members, or officers or (3) owned by Paragon (not including any software owned by third persons that is licensed by Paragon, such as Microsoft Office software).

“Paragon Truss Marks” means all trademarks, service marks, and trade dress that are used in commerce as a source identifier of Paragon to sell, offer for sale, promote, advertise, market, or distribute the Paragon Truss Software or any portion thereof, including without limitation software names, logos, non-functional looks and feels of user interfaces, screen displays, and distinctive colors and designs as well as the wordmarks “Paragon Truss” and “Truss Pal” and any associated design marks.

Requests for Production

1. All documents, including without limitation contracts, by which any ownership interest in the Paragon Truss Software was assigned, sold, transferred, licensed, or sublicensed to any of the Defendants.

2. All documents, including without limitation contracts, by which any ownership interest in the Paragon Truss Marks was assigned, sold, transferred, licensed, or sublicensed to any of the Defendants.

3. All documents, including without limitation contracts, by which any ownership interest in any trade secrets, inventions (whether reduced to practice or not), patents, trademarks, copyrights, or other intellectual property rights in the Paragon Truss Software was assigned, sold, transferred, licensed, or sublicensed to any of the Defendants.

4. All documents, including without limitation contracts, by which any of the Defendants assigned, sold, transferred, licensed, or sublicensed any right, title, or interest in the Paragon Truss Software to Paragon or any other third party.

5. All documents identifying any trade secrets in the Paragon Truss Software that any Defendant assigned, sold, transferred, licensed, or sublicensed to Paragon or any other third party.

6. All documents, including without limitation contracts, by which any of the Defendants assigned, sold, transferred, licensed, or sublicensed any inventions (whether reduced to practice or not), patents, trademarks, copyrights, or trade secrets in the Paragon Truss Software to Paragon or any other third party.

7. All documents that Defendants may seek to introduce as evidence at any trial or hearing in this action for the purpose of proving that one or more of the Defendants has an ownership interest in, or any right or title to, any of the Paragon Truss Software, Paragon Truss Marks, trade secrets owned by Paragon, or other intellectual property owned by Paragon.

8. All documents that Defendants rely upon in support of any denial, whether in whole or in part, for each of Plaintiff's Requests for Admission.

Respectfully submitted December 3, 2024.

MILLER & MARTIN PLLC

/s/James T. Williams

James T. Williams, TN BPR 16341

Robert F. Parsley, TN BPR 23819

Erin E. Steelman, TN BPR 38463

832 Georgia Avenue, Suite 1200

Chattanooga, TN 37402-2289

Telephone: (423) 756-6600

James.Williams@millermartin.com

Bob.Parsley@millermartin.com

Erin.Steelman@millermartin.com

Stephen E. Kabakoff, GA Bar No. 143164,

appearing pro hac vice

MILLER & MARTIN PLLC

1180 W. Peachtree Street, NW, Suite 2100

Atlanta, Georgia 30309

Telephone: (404) 962-6100

Stephen.Kabakoff@millermartin.com

*Counsel for Plaintiff Paragon Component
Systems, LLC*

CERTIFICATE OF SERVICE

I certify that on December 3, 2024 a copy of the foregoing **Plaintiff's First Set of Requests for Production to Defendants** is being served on all counsel of record via email.

MILLER & MARTIN PLLC

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INSPIRED PURSUITS, LLC,)	
KIRK GRUNDAHL, and)	
SUZANNE GRUNDAHL,)	
)	
Defendants.)	

**PLAINTIFF PARAGON COMPONENT SYSTEMS, LLC'S FIRST SET OF
INTERROGATORIES TO DEFENDANTS**

Under Federal Rule of Civil Procedure 26 and 33, Plaintiff Paragon Component Systems, LLC provides its First Interrogatories to Defendants.

Instructions

Defendants must respond to these interrogatories in compliance with the Federal Rules of Civil Procedure, applicable local rules of court and scheduling orders, and all other applicable rules and laws. Defendants must provide written answers to these interrogatories within 30 days of service. These interrogatories are continuing in nature. Defendants are required to supplement their responses pursuant to Federal Rule of Civil Procedure Rule 26(e)(1).

Definitions

“Defendants” or “You” means, collectively, Kirk Grundahl and Suzanne Grundahl individually and each of Qualtim, Inc., Center for Building Innovation, LLC, DrJ Engineering, LLC, and Inspired Pursuits, LLC and all parents, subsidiaries, affiliates, and related companies to

any of the foregoing and all owners, employees, members, directors, officers, agents, contractors, consultants, and representatives of any of the foregoing, and any other entities that may be later named as defendants in the present litigation. Each of the Defendants individually may be referenced herein as a Defendant.

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“Identify” with respect to an individual means stating the individual’s name, home or primary address, telephone number, and current employer if known, and for a business entity, the full company name and its primary address.

Interrogatories

1. Identify every individual and business entity that each Defendant claims has any ownership interest in, or any right or title to, the Paragon Truss Software, and specify the relative ownership percentage of the Paragon Truss Software alleged for each individual or business entity.

2. Identify with specificity any property, including without limitation intellectual property and physical property, owned or possessed by Paragon that any Defendant claims to have an ownership interest in, or any right or title to, and describe in detail the factual basis for any claim by the Defendant of a right, title, or interest in or to each such identified property.

3. Identify with specificity all legally binding contracts each Defendant relies upon as evidence showing that an ownership interest in, or a right or title to, the Paragon Truss Software or the Paragon Truss Marks was assigned, sold, transferred, licensed, or sublicensed to any of the Defendants. Each identified written contract shall include the title of the contract, the date of the contract (and effective date if different), and a list of all parties that executed the contract.

4. Identify each individual who knows how any of the Defendants obtained any ownership interest in, or right or title to, the Paragon Truss Software (including any intellectual property and trade secrets therein), the Paragon Truss Marks, or any other intellectual property that is currently in Paragon's custody, possession, or control.

5. Identify with specificity the intellectual property, including trade secrets, that any Defendant claims to have contributed to the Paragon Truss Software or Paragon Truss Marks, including the identity of each individual who made any such contribution by or on behalf of a Defendant, a detailed description of the specific contribution, when the contribution was made, who at Paragon received the contribution, and why the contribution was made.

6. For each of Plaintiff's Requests for Admission that any of the Defendants have denied, in whole or in part, please: (a) state the complete factual basis for your denial; (b) identify all persons with knowledge supporting the basis for your denial and describe with particularity the specific knowledge held by each person identified; and (c) identify all documents supporting your basis for the denial.

Respectfully submitted December 3, 2024.

MILLER & MARTIN PLLC

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*Counsel for Plaintiff Paragon Component
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CERTIFICATE OF SERVICE

I certify that on December 3, 2024 a copy of the foregoing **Plaintiff's First Set of Requests for Interrogatories to Defendants** is being served on all counsel of record via email.

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